

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:

DEANDRA L. GREEN

Debtor(s)

Case No. 1:16-bk-06886

Chapter 13

Honorable Deborah L. Thorne

NOTICE OF MOTION

To: *See attached service list*

PLEASE TAKE NOTICE that on **April 17, 2019 at 9:30 a.m.**, the undersigned will appear before the Honorable Deborah L. Thorne at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Courtroom 613, Chicago, Illinois and will then and there present **MOTION TO MODIFY PLAN**, a copy of which is hereby served upon you.

CERTIFICATE OF SERVICE

I, Joseph S. Davidson, hereby certify that I caused a copy of this notice and motion to be served, via electronic case filing to Marilyn O. Marshall, Chapter 13 Trustee and via United States First Class Mail to all parties listed on the attached service list, on March 13, 2019 before the hour of 5:00 p.m. from the office located at 2500 South Highland Avenue, Suite 200, Lombard, Illinois 60148.

/s/ Joseph S. Davidson

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**IN THE UNITED STATES BANKRUPTCY COURT
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DEANDRA L. GREEN

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MOTION TO MODIFY PLAN

NOW COMES, DEANDRA L. GREEN (the "Debtor"), through counsel, SULAIMAN LAW GROUP, LTD., pursuant to 11 U.S.C. § 1329, moves this Court for an Order Modifying Plan. In support thereof, Debtor states as follows:

1. On February 29, 2016, the Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code [Doc. #1]
2. On July 18, 2016, an Order Confirming Plan was entered [Doc. # 46].
3. The Debtor's confirmed plan provides:

Section D. Payments by debtor to the trustee; plan term and completion.

Debtor(s) will make regular payments to the trustee as follows:

1. *Initial plan term.* The debtor will pay to the trustee \$3,275.00 monthly for 12 months [and \$3,500.00 per month for 12 months, then \$4,000.00 per month for 12 months, then \$5,000.00 per month for 12 months, then \$5,565.00 per month for 12 months], for total payments, during the initial plan term, of \$256,080.00.

See Doc. #39.

4. The Debtor's father passed away, resulting in temporary financial hardship.

5. As result, the Debtor gradually incurred a \$20,996.00 default in payments to the trustee.

6. The Debtor proposes deferring the \$20,996.00 delinquency to the end of the plan term, and paying \$6,208.00 monthly for the remaining plan term - beginning in March 2019.

7. Modifying the Debtor's Plan will not prejudice the general unsecured creditors, as they will continue to be paid in full, as provided for in the Debtor's confirmed Plan.

WHEREFORE, the Debtor respectfully requests this Court enter an Order Modifying Debtor's Plan to defer the \$20,996.00 delinquency to the end of the plan term; to increase the Debtor's payments to the trustee to \$6,208.00 for the remaining plan term; and grant any other relief deemed appropriate and equitable.

DATED: March 13, 2019

Respectfully submitted,

DEANDRA L. GREEN

By: /s/ Joseph S. Davidson

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